

LHE:MD
F. #2020R00093

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

STIPULATION &
PROTECTIVE ORDER

-against-

20-CR-243 (LDH)

ASHRAF OMAR ELDARIR,

Defendant.

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IT IS HEREBY STIPULATED AND AGREED by the undersigned attorneys and ORDERED by the Court, pursuant to Federal Rule of Criminal Procedure 16(d), that:

1. All material produced by the government to defense counsel pursuant to Rule 16 of the Federal Rules of Criminal Procedure, 18 U.S.C. § 3500 and/or United States v. Giglio, and any other material produced by the government to defense counsel that is marked with the word “SENSITIVE or “PROTECTED MATERIAL” or otherwise identified in writing as sensitive or protected material (the “Protected Material”) may not be copied or disseminated to anyone other than the defendant and members of the defense attorneys’ staff, to include support staff and investigators assisting each defense counsel.
2. To the extent that defense counsel determines it is necessary to disseminate any Protected Material to a staff member or investigator, such person must be advised of this Order, made aware of his or her obligation not to copy or disseminate such material, and directed to return such material to defense counsel at the conclusion of the trial.

3. The defendant may review the Protected Material only in the presence of defense counsel or defense counsel's legal staff. The defendant is prohibited from having possession, custody, or control of the Protected Material, except to the extent necessary for the defendant to review the Protected Material in the presence of defense counsel or defense counsel's staff. The defendant is prohibited from disseminating or discussing the Protected Material with any individuals other than his defense counsel, support staff and investigators. Defense counsel may review the Protected Material with his client, but may not permit his client to retain such materials, or copies thereof.

4. If the defendant obtains substitute counsel, the undersigned defense counsel will not transfer any portion of the Protected Material or any copies, notes, transcripts, documents or other information derived or prepared from the Protected Material unless and until substitute counsel enters into this Stipulation and Order;

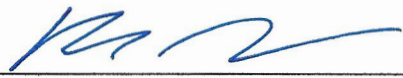
5. At the conclusion of the trial, all Protected Material should be either: returned to the government; maintained in defense counsel's file for use in post-trial proceedings; or destroyed.

6. Either party to this Stipulation and Order may petition the court at any time for a modification of the Order.

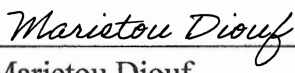
7. This Court shall retain jurisdiction over all persons subject to this Order to the extent necessary to enforce any obligations arising hereunder or to impose sanctions for any contempt thereof.

Dated: Brooklyn, New York
August 24, 2020

SETH D. DUCHARME
Acting United States Attorney
Eastern District of New York



Kannan Sundaram, Esq.
Attorney for Ashraf Omar Eldarir

By: 

Marietou Diouf
Assistant U.S. Attorney

SO ORDERED
this 28 day of August, 2020

s/ LDH

THE HONORABLE LASHANN DEARCY HALL
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK